

1

2

3

4

5

6

7

8

9

10

UNITED STATES DISTRICT COURT

11

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

12

13 CHASOM BROWN, WILLIAM BYATT,  
14 JEREMY DAVIS, CHRISTOPHER  
15 CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

16 Plaintiffs,

17 v.

18 GOOGLE LLC,

19 Defendant.

20

21

22

23

24

25

26

27

28

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
GOOGLE LLC'S RENEWED  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF THE MATERIAL  
ASSOCIATED WITH  
PLAINTIFFS' REQUEST FOR AN  
ORDER FOR GOOGLE TO SHOW  
CAUSE FOR WHY IT SHOULD NOT  
BE SANCTIONED FOR DISCOVERY  
MISCONDUCT**

Referral: Hon. Susan van Keulen, USMJ

## [PROPOSED] ORDER

Before the Court is Google LLC’s Renewed Administrative Motion To Seal Portions Of The Material Associated With Plaintiffs’ Request For An Order For Google To Show Cause For Why It Should Not Be Sanctioned For Discovery Misconduct (“Motion”). Having considered the Motion, supporting declarations, and other papers on file, and good cause having been found, the Court ORDERS as follows:

1. Dkt. 429

Documents Sought to Be Sealed	Text to be Sealed	Reason(s) for Court's Ruling
Plaintiffs' Request for Order For Google To Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct	GRANTED as to the portions at:  PDF Pages 8:8-9, 8:10-11, 8:13-15, 8:20, 11:20, 12:16, 13:4, 13:21, 15:2-8, 16:14-23, 20:22, 21:7-10, 21:12, 21:21, 22:3, 23:14	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Mark C. Mao in Support of Plaintiffs' Order to Show Cause Motion	GRANTED as to the portions at:  PDF Pages 3:12-13, 3:26-27,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's

1	4:3, 4:11, 4:19, 4:23-24, 4:27, 5:1, 5:12-13, 5:16, 5:20-28, 6:5, 6:8-9, 6:13-14, 6:17, 6:19-21, 7:5-6, 7:8, 7:10, 7:15, 7:18, 8:5, 8:13, 8:23, 9:4	internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
16	Mao Decl., Exhibit 3 (GOOG-BRWN- 00845423)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect

		Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 4 (GOOG-BRWN- 00023909)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding its employees, their organizational division, manager, and title, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may attempt to contact and/or hire these employees relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
	Mao Decl., Exhibit 8 (excerpts from the December 2, 2021 deposition of Google employee Chris Liao)	GRANTED as to the portions at:  Pages 122:24, 123:2, 123:8, 123:23, 124:11, 124:18, 124:23, 124:25, 126:6, 126:8, 126:12, 126:23, 127:9-10, 127:19, 128:7, 128:9, 131:19, 131:25, 132:5, 132:10-11, 132:15, 132:22, 133:4, 133:9, 133:12, 133:15, 133:19, 134:13, 138:10, 138:19, 139:7, 139:18, 139:24, 140:5, 140:21,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals

1	141:24	Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
10	Mao Decl., Exhibit 9 (GOOG-BRWN-00845312)	GRANTED as to:  Redacted in its entirety
27	Mao Decl., Exhibit 10 (GOOG-BRWN-00845569)	GRANTED as to:  Redacted in its entirety

		<p>highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Mao Decl., Exhibit 11 (GOOG-BRWN-00845277)	<p>GRANTED as to: Redacted in its entirety</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3.</p>

		Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6	Mao Decl., Exhibit 12 (GOOG-CABR- 05144884)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 14 (GOOG-CABR- 04324934)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal

		metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 15 (GOOG-BRWN- 00845477)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products.

		<p>It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Mao Decl., Exhibit 16 (GOOG-BRWN- 00845481)	<p>GRANTED as to:  Redacted in its entirety</p> <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
22 23 24 25 26 27 28	Mao Decl., Exhibit 17 (GOOG-BRWN- 00845437)	<p>GRANTED as to:  Redacted in its entirety</p> <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential</p>

		and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 18 (GOOG-CABR-05280756)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
	Mao Decl., Exhibit 19	GRANTED as to the portions	The information requested to be sealed

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	(excerpts of Google's Responses and Objections to Plaintiffs' Ninth Set of Interrogatories)	at: Page 4:13	contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal log, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 20 (February 23, 2022 email exchange between counsel for Plaintiffs and counsel for Google)	GRANTED as to the portions at: PDF Pages 2-4	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect

		Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 21 (GOOG-CABR-05757329)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
	Mao Decl., Exhibit 22 (GOOG-BRWN-00845281)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary

		<p>course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Mao Decl., Exhibit 23 (GOOG-BRWN-00845275)	<p>GRANTED as to: Redacted in its entirety</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information</p>

		to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Mao Decl., Exhibit 24 (GOOG-BRWN-00845274)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and links to internal documents, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 25 (GOOG-CABR-03668216)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its

1		important services, and falls within the
2		protected scope of the Protective Order
3		entered in this action. See Dkt. 81 at 2-3.
4		Public disclosure of such confidential
5		and proprietary information could affect
6		Google's competitive standing as
7		competitors may alter their systems and
8		practices relating to competing products.
9		It may also place Google at an increased
10		risk of cybersecurity threats, as third
11		parties may seek to use the information
12		to compromise Google's internal
13		practices relating to competing products.
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

## 2. Dkt. 510

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Plaintiffs' Administrative Motion to File Supplement in Support of Their Motion for Order For Google To Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct	GRANTED as to the portions at:  Pages 1:10-13, 1:24, 2:1, 2:6, 2:9-10, 3:5, 3:14, 4:10-11, 4:13, 4:17, 4:19, 5:10, 5:25-26	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an

		increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Declaration of Mark C. Mao in Support of Plaintiffs' Administrative Motion to File Supplement in Support of Their Request for Order to Show Cause Motion	GRANTED as to the portions at:  Pages 1:20-24, 2:1, 3:17, 3:22, 4:2, 4:4	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Mao Decl., Exhibit 1 (GOOG-BRWN-00536949)	GRANTED as to:  Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary	

		<p>functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Mao Decl., Exhibit 2	<p>GRANTED as to:</p> <p>Redacted in its entirety</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of</p>

		such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Mao Decl., Exhibit 3 (Excerpts of the Deposition Transcript of Dr. Caitlin Sadowski)	GRANTED as to the portions at:  Pages 64:11-12, 65:1, 66:15-20, 68:6-8, 68:17-19, 69:10, 70:3, 70:5-6, 70:18, 70:21, 70:23, 71:9, 72:24-25, 73:17, 73:22, 74:2-3, 74:7, 74:10, 76:24-25, 80:8-9, 80:13, 80:16, 80:24, 81:3-5, 81:7, 81:12-14, 85:11, 87:10, 87:16-17, 87:23, 88:4, 88:10, 91:4, 91:13, 91:17, 92:11
26 27 28	Mao Decl., Exhibit 4 (Excerpts of the Deposition Transcript of Mandy Liu)	GRANTED as to the portions at:  Pages 14:18, 14:25, 15:10-12, 15:14-15, 39:8,

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
																	40:5, 40:9, 40:11, 40:16-17

internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

18  
19       **3.      Dkt. 527 &     4.      Dkt. 529 (Correction of Ansorge Exhibits)**

20 <b>Documents Sought to Be Sealed</b>	21 <b>Text to be Sealed</b>	22 <b>Reason(s) for Court's Ruling</b>
23                   Google's Opposition for Sanctions	24                   GRANTED as to the portions at:  25                   Pages 2:10, 4:4, 4:7, 4:15, 4:19-20, 5:5, 5:13, 5:24-25, 6:7-8, 6:10-11, 6:14, 6:18-19, 7:18-19, 7:21, 10:24, 10:27, 12:19-20, 13:9, 13:12, 13:15, 13:17, 13:19, 14:1, 14:7, 14:27-28, 15:9, 15:15, 15:20, 15:22, 15:26, 16:9, 18:28, 19:1, 19:4, 19:12, 21:14-	26                   Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

	15, 21:19	
1 2 3 4 5 6 7 8 9	Ansorge Declaration  GRANTED as to the portions at:  Pages 2:20, 2:23, 3:3, 3:10, 4:11, 4:14, 4:17, 5:17, 5:24, 5:27-28, 6:3, 6:5-6, 6:9-11, 6:14-15, 7:5, 7:7, 7:13-14, 7:16, 7:21, 7:24-25, 7:28, 8:8, 8:13-14, 8:28, 9:14, 10:6-7, 10:11-12, 10:25, 10:27-28, 11:2, 11:4, 11:11, 11:19-20, 11:22, 12:19-20, 13:23, 14:1, 14:27, 15:14, 15:25, 16:4, 16:14	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
10 11 12 13 14	Exhibit 3 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions  GRANTED as to the portions at:  Pages 66:5, 67:18	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
15 16 17 18 19	Exhibit 4 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions  GRANTED as to the portions at:  Page 2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data sources, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
20 21 22 23 24	Exhibit 5 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions  GRANTED as to the portions at:  Pages 1-2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
25 26 27 28	Exhibit 6 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions  GRANTED as to the portions at:  Pages 1-2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details

1	Sanctions		related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 7 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Page 1	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data sources, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
10	Exhibit 9 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Page 1	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, as well as Google's internal practices with regard to Incognito and its proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
15	Exhibit 10 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 1-2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
20	Exhibit 11 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Page 1	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary

		course of its business and is not generally known to the public or Google's competitors.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Exhibit 12 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 1, 3-8	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, Google's internal practices with regard to Incognito and its proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
17 18 19 20 21 22	Exhibit 15 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 8-10	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
23 24 25 26 27 28	Exhibit 16 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Page 1	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
	Exhibit 17 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 3-4	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
	Exhibit 18 to Ansorge	GRANTED as to the	Narrowly tailored to protect confidential

1 2 3 4 5 6	Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	portions at: Pages 2, 6-7, 10-11	technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
7 8 9 10 11	Exhibit 19 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
12 13 14 15 16	Exhibit 20 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
17 18 19 20 21	Exhibit 21 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
22 23 24 25 26 27 28	Exhibit 22 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

1	Exhibit 23 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to: Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 24 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to: Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal metrics, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 25 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to: Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal metrics, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 26 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to: Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 27 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to: Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, and their proprietary functionalities, that Google

		maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.	
1	Exhibit 28 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 29 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 30 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 31 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 32 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details

1	Sanctions		related to internal metrics, project names, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 33 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 34 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including the various types of data sources which include details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 35 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 36 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects and their proprietary functionalities, as well as, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

1	Exhibit 37 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 38 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Page 8:12	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 39 to Ansorge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to:  Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Liao Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 1:4-5, 1:7-8, 3:2, 3:6, 3:8-14, 3:16	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Leung Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 1:11-12, 2:16-17, 3:11-4:2, 4:5-6, 4:8	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its

		business and is not generally known to the public or Google's competitors.	
1 2 3 4 5 6 7 8	Golueke Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 1:22, 1:24, 2:12-13, 2:15-16, 2:20, 3:1, 3:10, 4:8, 4:13	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, data sources, logs, and its proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
9 10 11 12 13 14	Exhibit 1 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
15 16 17 18 19 20	Exhibit 2 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
21 22 23 24 25 26 27 28	Exhibit 3 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
	Exhibit 4 to Trebicka Declaration in support of	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly

1	Google's Opposition to Plaintiffs' Request for Sanctions		sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 5 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 7 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 8 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect highly sensitive and confidential information regarding Google's internal systems and operations, including details related to employees and organizational structure, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 9 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not

		generally known to the public or Google's competitors.	
1	Exhibit 10 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 11 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, internal metrics and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 12 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including the various types of data sources which details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 13 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 15 to Trebicka Declaration in support of	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly

1	Google's Opposition to Plaintiffs' Request for Sanctions		sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2			
3			
4			
5			
6	Exhibit 16 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
7			
8			
9			
10			
11			
12	Exhibit 17 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
13			
14			
15			
16			
17			
18	Exhibit 18 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
19			
20			
21			
22			
23			
24			
25	Exhibit 19 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google
26			
27			
28			

		maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.	
1	Exhibit 20 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 21 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 22 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 23 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or

		Google's competitors.	
1	Exhibit 24 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2			
3			
4			
5			
6			
7			
8	Exhibit 25 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
9			
10			
11			
12			
13			
14	Exhibit 26 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
15			
16			
17			
18			
19			
20			
21	Exhibit 27 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
22			
23			
24			
25			
26			
27	Exhibit 28 to Trebicka Declaration in support of Google's Opposition to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal
28			

1	Plaintiffs' Request for Sanctions		systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Exhibit 29 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
3	Exhibit 30 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Exhibit 31 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 33 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at: Page 2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals and logs, that Google maintains as confidential in the ordinary course of its business and is

		not generally known to the public or Google's competitors.	
1 2 3 4 5 6 7 8	Exhibit 34 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at: Pages 2-25	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
9 10 11 12 13 14 15 16 17 18 19 20	Exhibit 35 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at: Pages 2, 4	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
21 22 23 24 25 26	Exhibit 36 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at: Pages 2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal links, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
27 28	Exhibit 39 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at: Pages 262:5, 262:7, 262:15, 262:24	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
	Exhibit 40 to Trebicka Declaration in support of Google's Opposition to	GRANTED as to the portions at:	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal

1	Plaintiffs' Request for Sanctions	Pages 131:19, 131:25, 132:5, 132:10-11, 132:15, 132:22, 133:4, 133:9, 133:12, 133:15, 133:19	systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Exhibit 42 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 69:10, 70:3, 70:5-6, 70:18, 70:21, 70:23, 71:9, 72:24-25, 73:17, 73:22, 76:24-25, 77:8, 91:4, 91:13, 91:17, 92:11	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
11	Exhibit 47 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 40:4, 40:23-24, 41:1, 41:3, 41:8, 41:15, 47:23-24, 48:6, 48:8-9, 48:18	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
17	Exhibit 49 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	GRANTED as to the portions at:  Pages 4:12, 4:18, 4:21-22, 372:11, 372:15	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
23	Exhibit 50 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

1  
2  
3  
4       **5. Dkt. 535**

<b>Document</b>	<b>Text To Be Sealed</b>	<b>Basis for Sealing Portion of Document</b>
Plaintiffs' Reply in Support of Request for an Order For Google To Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct	GRANTED as to the portions at:  Pages 1:5, 1:8-9, 3:1, 3:14-15, 4:4-5, 4:7, 4:9, 4:19, 5:4, 5:10, 6:15-16, 6:23, 7:1-2, 7:9-11, 8:14-15, 11:18	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Third Declaration of Mark C. Mao in Support of Plaintiffs' Request for Order to Show	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Cause Motion (Mao Reply Declaration)  PDF Pages 3:10-13, 3:15, 3:18, 3:20-21, 3:26-27, 4:2, 4:12-14	information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
20 21 22 23 24 25 26 27 28	Mao Reply Decl., Exhibit 1  GRANTED as to the portions at:  PDF Page 2	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's

		<p>internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Mao Reply Decl., Exhibit 2	<p>GRANTED as to the portions at:</p> <p>PDF Pages 2-4</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an</p>

		increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Mao Reply Decl., Exhibit 3 (Transcript of March 23, 2022 Hearing before Special Master Douglas Brush)	GRANTED as to the portions at:  Pages 6:3, 12:16, 39:19-20, 40:4, 41:1, 41:15, 43:17-19, 44:3, 44:22, 45:4, 47:24, 48:18, Index (PDF Pages 28, 33)	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
24 25 26 27 28	Mao Reply Decl., Exhibit 4 (GOOG-BRWN-00846508)	GRANTED as to the portions at:  Sealed in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their

		<p>proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Mao Reply Decl., Exhibit 5 (GOOG-CABR-03849022)	<p>GRANTED as to the portions at:  Sealed in its entirety</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective</p>

		Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Reply Decl., Exhibit 6 (Stipulation)	GRANTED as to the portions at:  Pages 3:11, 3:13-4:9
	Declaration of Christopher	GRANTED as to the
		The information requested to be

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Thompson in Support of Plaintiff's Request for an Order to Show Cause portions at:  PDF Pages 3:25, 4:19-20, 4:26-27, 5:2-7, 5:9, 5:17-19, 5:23, 6:3-5, 6:8, 6:10-11, 6:15, 6:17-19, 7:26, 8:1-2, 9:14-15, 9:17-18, 9:22	sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
21 22 23 24 25 26 27 28	Thompson Decl., Exhibit B-1 (GOOG-CABR-05256755)  GRANTED as to the portions at:  Sealed in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or

		<p>Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Thompson Decl., Exhibit B-2 (GOOG-CABR-00799341)	GRANTED as to the portions at:  PDF Page 2	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It</p>

		may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Thompson Decl., Exhibit C (GOOG-CABR-04773853)	GRANTED as to the portions at:  Sealed in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
25 26 27 28	Thompson Decl., Exhibit D (GOOG-CABR-03652549)	GRANTED as to the portions at:  Sealed in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's

1		internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
12		

## 6. Dkt. 548

Documents Sought to Be Sealed	Text to be Sealed	Reason(s) for Court's Ruling
Google's Proposed Findings of Fact and Conclusions of Law	GRANTED as to the portions at:  Pages 2:12, 2:25-26, 3:2-3, 3:15, 4:15, 5:13-18, 6:7, 6:17-19, 6:23-24, 7:17-18, 9:1, 9:9, 9:11, 9:15-16, 10:15	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

1           **7. Dkt. 551**

<b>Document</b>	<b>Text To Be Sealed</b>	<b>Basis for Sealing Portion of Document</b>
Plaintiffs' Proposed Findings of Fact and Conclusions of Law (Dkt. 551)	GRANTED as to the portions at:  Pages 3:23-25, 4:2-4, 4:24-25, 5:19-22, 6:1-2, 6:5, 6:9, 6:11, 6:13, 6:25, 7:22-23, 7:25, 8:8, 8:11, 8:17-8:27, 9:1-15, 15:15-17, 16:14-17, 19:25, 21:2, 21:6, 23:1, 23:3, 25:16-17, 26:7-9, 26:11, 26:17, 27:1-2, 27:7, 27:26, 28:1-32, 28:17, 28:19, 28:26, 29:11, 29:16, 30:19, 31:10, 31:13, 31:15-16, 31:20, 31:27, 33:5, 33:18, 35:5, 35:16, 41:18-19, 41:22, 41:25, 42:1, 42:10, 42:13, 42:17, 42:25, 47:15, 52:22, 53:9-10	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

25           **8. Dkt. 582**

<b>Document</b>	<b>Text To Be Sealed</b>	<b>Basis for Sealing Portion of Document</b>
Exhibit A to Mao Declaration - Plaintiffs' (Proposed) May 16, 2022 Supplement to Their	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary

1	Sanctions Motion	Page 2:18	information regarding highly sensitive features of Google's internal systems and operations, including Google's internal logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18	Exhibit B to Mao Declaration - Google's Supplemental Objections and Responses to Plaintiffs' Interrogatories Set 9 (No. 35)	GRANTED as to the portions at:  Pages 5:4-7, 5:20-6:18, 6:20, 6:27, 7:3, 7:7-10, 7:14-15	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within

1		the protected scope of the Protective
2		Order entered in this action. <i>See</i> Dkt.
3		81 at 2-3. Public disclosure of such
4		confidential and proprietary
5		information could affect Google's
6		competitive standing as competitors
7		may alter their systems and practices
8		relating to competing products. It
9		may also place Google at an
10	<b>SO ORDERED.</b>	increased risk of cybersecurity
11		threats, as third parties may seek to
12	DATED: _____	use the information to compromise
13		Google's internal practices relating
14		to competing products

HON. SUSAN VAN KEULEN  
United States Magistrate Judge